

EXHIBIT B

MARSHALL DENNEHEY
By: Sharon M. O'Donnell, Esquire
PA ID# 79457
100 Corporate Center Dr., Ste. 201
Camp Hill, PA 17011
Ph. 717-651-3503
Fax 717-651-3707
Email: smodonnell@mdwcg.com
Attorney for Defendants

VIA ELECTRONIC FILING

ERICA HAMILTON,	:	IN THE COURT OF COMMON PLEAS
	:	BERKS COUNTY, PENNSYLVANIA
Plaintiff	:	
	:	NO. 22-15287
v.	:	
	:	CIVIL ACTION - LAW
ALBRIGHT COLLEGE,	:	
	:	JURY TRIAL DEMANDED
Defendant	:	

NOTICE TO THE PROTHONOTARY
OF BERKS COUNTY, PENNSYLVANIA

TO THE PROTHONOTARY:

Pursuant to 28 U.S.C. § 1446(a), Defendant Albright College, by its attorneys, Sharon M. O'Donnell, Esquire and MARSHALL DENNEHEY, files herewith a copy of the Notice of Removal that was filed in the United States District Court for the Eastern District of Pennsylvania on February 16, 2023, as set forth in the attached Exhibit A.

MARSHALL DENNEHEY

By: /s/ Sharon M. O'Donnell
Sharon M. O'Donnell, Esquire
PA ID# 79457
100 Corporate Center Dr., Ste. 201

Camp Hill, PA 17011
Ph. 717-651-3503 Fax: 717-651-3707
Email: smodonnell@mdwecg.com

Dated: 2/16/2023

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Submitted by: Defendant Albright College

Signature: /s/ Sharon M. O'Donnell

Name: Sharon M. O'Donnell, Esquire

Attorney No. (if applicable): 79457

ERICA HAMILTON,	:	IN THE COURT OF COMMON PLEAS
	:	BERKS COUNTY, PENNSYLVANIA
Plaintiff	:	
	:	NO. 22-15287
v.	:	
	:	CIVIL ACTION – LAW
ALBRIGHT COLLEGE,	:	
	:	JURY TRIAL DEMANDED
Defendant	:	

CERTIFICATE OF SERVICE

I, Sharon M. O'Donnell, Esquire, of Marshall Dennehey, do hereby certify that on February 16, 2023, I served a copy of the foregoing document being filed with the Court via First Class United States mail, postage prepaid, and via e-mail as follows:

William Rush, Esquire
Rush Law Group, LLC
38 N. 6th Street
P.O. Box 758
Reading, PA 19603-0758
wrush@rushlawberks.com
Attorney for Plaintiff, Erica Hamilton

MARSHALL DENNEHEY

/s/ Sharon M. O'Donnell
Sharon M. O'Donnell, Esquire
PA ID# 79457
100 Corporate Center Dr., Ste. 201
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Exhibit A



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(717) 651-3500 Fax (717) 651-3707

Direct Dial: (717) 651-3503
Email: smodonnell@mdwcg.com

February 16, 2023

Prothonotary
Berks County Courthouse, 2nd Floor
633 Court Street
Reading, PA 19601

RE: Hamilton v. Albright College
Berks County Court of Common Pleas No. 22-15287
Our File No. 40012-00128

Dear Sir/Madam:

Enclosed please find for filing an original and one copy of a Notice confirming the above-captioned matter was removed to Federal District Court on February 16, 2023.

Please feel free to contact me with any questions you may have.

Very truly yours,

/s/ Sharon M. O'Donnell

Sharon M. O'Donnell

SMO:acz
Enclosures

cc: William Rush, Esq. - via email (w/enc.)



100 Corporate Center Drive, Suite 201, Camp Hill, PA 17011
(717) 651-3500 Fax (717) 651-3707

Direct Dial: (717) 651-3503
Email: smodonnell@mdwecg.com

February 16, 2023

VIA EMAIL

William Rush, Esquire
Rush Law Group, LLC
38 N. 6th Street, P.O. Box 758
Reading, PA 19603-0758

RE: Hamilton v. Albright College
Berks County Court of Common Pleas No. 22-15287
Our File No. 40012-00128

Dear Mr. Rush:

Enclosed please find Notice of Removal to the United States District Court for the Eastern District of PA confirming the above-captioned matter was removed to Federal District Court on February 15, 2023.

Please feel free to contact me with any questions you may have.

Very truly yours,

/s/ Sharon M. O'Donnell

Sharon M. O'Donnell

SMO:acz
Enclosures

cc: William Rush, Esq. - via email (w/enc.)